



September 19, 2013

Ms. Shelly Lam
On-Scene Coordinator
U.S. Environmental Protection Agency
2525 North Shadeland Avenue
Indianapolis, Indiana 46219

**Subject: Work Plan, Health and Safety Plan & Quality Assurance Project Plan
 Technical Assistance Review Comments
 Revision 0
 Kokomo Dump
 Kokomo, Howard County, Indiana
 EPA Contract No. EP-S5-10-10
 Technical Direction Document (TDD) No. TO-01-13-08-1028**

Dear Ms. Lam:

The Oneida Total Integrated Enterprises (OTIE) Superfund Technical Assessment and Response Team (START) is submitting one copy of the Technical Assistance and Review Comments for the Kokomo Dump Work Plan including the Health and Safety Plan and Quality Assurance Project Plan prepared by SESCO Group.

Please contact me at (678) 255-7764, or Raghu Nagam at (312) 220-7005, if you have any questions regarding these technical review comments.

Sincerely,

Stacey DeLaReintrie
START Project Manager
Enclosure

cc: Raghu Nagam, START Program Manager (w/o enclosure)
 START File

Technical Assistance and Review Comments

1.0 Introduction

This document specifies the results of the Oneida Total Integrated Enterprises (OTIE) technical assistance and review comments of the following plans:

Site Name:	Kokomo Dump
Documents:	Work Plan, Draft (dated September 4, 2013) Health and Safety Plan, Draft (dated September 4, 2013) Quality Assurance Project Plan (dated February 5, 2013)
Location:	Kokomo, Howard County, Indiana
START Reviewers:	Stacey DeLaReintrie/Raghu Nagam
Date of Review:	September 2013

The City of Kokomo, the responsible party (RP) in the Administrative Settlement Agreement and Order on Consent for Removal Action (AOC) Docket No. V-W-13-C-018 intends to use this plan as a Work Plan including the Health and Safety Plan and the Quality Assurance Project Plan for the former Kokomo Dump Site. The document was prepared by the RP's consultant SESCO Group located in Indianapolis, Indiana. The site is briefly described in Section 2. Section 3 provides general and specific comments regarding the review of the Work Plan; Section 4 the Health and Safety Plan; and Section 5 the Quality Assurance Project Plan.

2.0 Site Description

The Kokomo Dump Site was a municipal landfill located at 1130 S. Dixon Rd., Kokomo, Indiana. The Site occupies approximately 4.54 acres and is owned by the City of Kokomo. The geographical coordinates for the building are 40.473513 degrees north latitude and 86.164533 degrees west longitude. The area surrounding the Site is a mix of residential and industrial properties. The Site is surrounded by Dixon Road to the west, commercial properties on the north, residential properties to the south, and a

railroad on the east. The Wildcat Creek is approximately 500 feet from the Site on the north side and flows west towards Wabash River near Lafayette, IN.

3.0 Work Plan Comments

General Comments

The Work Plan, submitted to the U.S. Environmental Protection Agency (EPA) by SESCO, was reviewed for the following: completeness, consistency, the correct application of the AOC, logic, and site characteristics.

OTIE Comments

1. *The Work Plan should address the qualifications of the removal contractor proposed for soil and drum removal - specifically indicate if they are licensed environmental remediation contractors and if their crew is trained in and has all appropriate HAZWOPER and refresher trainings as required under OSHA regulations.*
2. *The Work Plan should address contingencies and preparedness to address situations such as spills occurring from liquids or broken drums, etc. that may arise while removing as well as while transporting drums to the staging area*

Specific Comments

Section 1.2, page 2, first paragraph – SESCO states that “It is presumed that a portion of the property to the south of the Site was part of the dump site.”

OTIE Comment – *Will the property to the south of the Site be included in the investigation?*

Section 3.3 – “In compliance with the request of the U.S. EPA, SESCO proposes to sample surface soil
.....”

OTIE Comment – *Surface soil sample depths need to be specified. Also, it is preferred to collect surface samples after removing the top soil?*

Section 4.0 – First paragraph, second sentence states “The two (2) drums will be removed”

***OTIE Comment** – Just like the proposed analysis of the soil beneath the drums, these drums should also be sampled to identify its characteristics for proper disposal. When over packed, these drums should be labeled properly.*

Section 4.0 – Third paragraph, first sentence states “As a summary there would be a total of six (6) 55-gallon drums....”

***OTIE Comment** – Should this be 4 identified drums? So far, only 2 field observed drums and 2 IDW drums were mentioned.*

Section 4.0 – Third paragraph, second sentence states “SESCO will assume the drum contents will be considered hazardous waste”

***OTIE Comment** –These investigation derived waste (IDW) drums were sampled to identify its’ characteristics for proper disposal. The IDW results are in the site assessment report and indicate them to be non-hazardous. These results should be evaluated against appropriate regulations and disposal requirements to properly classify them and dispose them appropriately, rather than assuming them to be hazardous.*

Section 4.0 – Last paragraph, first sentence states “Drum and soil removal is expected to take one (1) field day to complete”

***OTIE Comment** – please address utility clearance requirements and the time in this paragraph.*

4.0 Health and Safety Plan (HASP) Comments

General Comments

The HASP submitted to EPA by SESCO, was reviewed for the following: completeness, consistency, logic, and site characteristics.

OTIE Comments

- 1. The HASP includes several sections (5.5)/and or references to test pit excavations and depths of excavations up to 15 feet below ground surface. The current work plan scope does not include these activities and so these unrelated sections/references should be deleted from this HASP. If future work activities related to these tasks occur, an amendment to this HASP should be made to address these activities.*
- 2. The HASP does not discuss excavation of soil underneath the drums, their storing and sampling activities. Please include this discussion.*
- 3. The HASP should discuss IDW sampling*

Specific Comments

Section 1.2.3 SESCO Site Health and Safety Officer (SSO) – “Some of the SSO’s specific responsibilities include.”

OTIE Comment – *one of the responsibilities to be included here should be in relation to checking and assuring that all site personnel have appropriate HAZWOPER and related certifications, are field eligible and that their certifications are always maintained on-site.*

Section 6.1.3 Draeger Tubes – “As discussed if the PID/FID readings exceed an action level of 5 ppm, above background in the breathing zone (sustained 5 minute reading) then Draeger tubes will be used to evaluate the concentration of specific VOCs”

OTIE Comment – *please specify chemicals that will be monitored with the Draeger tubes, their detection levels and related action levels for personal protection. Also, discuss the rationale for selecting these chemicals for monitoring by Draeger tubes.*

Section 7.3.4 Buried Drum Removal and Sampling & Test Pit Excavation – “The initial level of protection to be worn... is Modified Level C...”

***OTIE Comment** – Since these are drums with unknown solid materials, it has to be sampled at a minimum in Level C PPE. All other activities may be performed in Modified Level C PPE if conditions as specified in the HASP are met.*

Section 7.3.4 – “Should any of the action levels be exceeded, the work will stop and the level of protection will be upgraded....”

***OTIE Comment** – At what action level will the level of protection be upgraded?*

5.0 Quality Assurance Project Plan (QAPP) Comments

General Comments

The QAPP submitted to EPA by SESCO, was reviewed for the following: completeness, consistency, the correct application of the AOC, logic, and site characteristics.

***OTIE Comment** – The QAPP should include a table summarizing the number of samples, number of QA/QC samples, and the OSWER method of analysis that is being proposed for this sampling event.*

Specific Comments

Section 3.3, Table 1, page 3 – SESCO indicates that one duplicate sample will be collected per 20 samples.

***OTIE Comment** – OTIE recommends collection of one duplicate sample per every 10 field samples.*

Section 6.1, page 9 – “Surface soil samples will be collected using a trowel or hand auger, depending on soil characteristics...”

***OTIE Comment** – At what depths will the surface soil samples be collected?*

Section 7.1.4, page 12 – “Boring logs will be maintained which will include...”

***OTIE Comment** – There is no mention of collecting soil boring samples in the Work Plan. Will subsurface soil borings be collected? If not, please delete these references, and references to groundwater sampling.*

6.0 Conclusion

OTIE suggests that the Removal Action Work Plan, the HASP and the QAPP be revised according to the comments and suggestions of this document.